

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

CRAIG ALLEN JOHNSON,
Plaintiff,

VS.

TARGET LOGISTICS
MANAGEMENT, LLC.,
Defendant.

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CAUSE NO. 4:15-cv-1490

DEFENDANT’S DETAILED TRIAL PLAN

Pursuant to the Court’s Trial Schedule Order dated March 15, 2017 (Docket #102), Defendant Target Logistics Management, LLC, files the following Detailed Trial Plan.

1. The time allocation for direct and redirect examination of each witness it

intends to call:

Dan McGahan – 3.5 hours

Brad Archer - 2.5 hours

Joe Murphy – 2.5 hours

Ray Crump – 2.5 hours

Travis Kelly – 2.5 hours

Donald Alexander – 1.5 hours

Katherine Westgeest - .75 hours

Dave Ludwig - .75 hours

Patrick Murphy - .75 hours

Tom King – 2 hours

Fred Bass – 2 hours

2. The time allocation for cross-examination of each of the opponent's listed witnesses:

Craig Johnson – 2.0 hours

Kristi Johnson – 1.0 hours

John Paul Vincent – 1.50 hours

Helga Zauner – 1.0 hours

3. The remaining time necessary to present each party's side of the case:

Voir Dire 2.0 hours (1.0 hour per side)

Opening 1.50 hours (.75 hours per side)

Closing 2.0 hours (1.0 hour per side)

Potential rebuttal witnesses

Danny Handshoe – 1.0 hours

Terry Legions – 1.0 hours

Greg Hauk – 1.0 hours

Bob Tryan – 1.0 hours

Dave Ludwig - .75 hours

Patrick Murphy - .75 hours

Tom King – 2 hours

Fred Bass – 2 hours

2. The time allocation for cross-examination of each of the opponent's listed witnesses:

Craig Johnson – 2.0 hours

Kristi Johnson – 1.0 hours

John Paul Vincent – 1.50 hours

Helga Zauner – 1.0 hours

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Closing 2.0 hours (1.0 hour per side)

Potential rebuttal witnesses

Danny Handshoe – 1.0 hours

Terry Legions – 1.0 hours

Greg Hauk – 1.0 hours

Bob Tryan – 1.0 hours

4. The total time estimate for all hearing matters necessary to present each party's case:

Charge conference and miscellany – 3.5 hours

Respectfully submitted,

GORDON ARATA MCCOLLAM
MONTGOMERY BARNETT
DUPLANTIS & EAGAN, LLC

/s/ Charles L. Stinneford

Charles L. Stinneford
State Bar No. 00785057
Federal Bar No. 17539
Donna Phillips Currault
LA Bar No.: 19533
1980 Post Oak Blvd., Suite 1800
Houston, Texas 77056
Telephone: (713) 333-5500
Facsimile: (713) 333-5501
cstinneford@gordanarata.com

*Attorneys for Defendant
Target Logistics Management, LLC*

CERTIFICATE OF SERVICE

I certify that I have served a copy of the above and foregoing Defendant's Detailed Trial Plan via Notice of Electronic filing using this Court's CM/ECF system to counsel of record participating in the CM/ECF system, or by placing signed copies in the United States mail, postage prepaid, to counsel of record not participating in the CM/ECF system on this 16th day of March, 2017.

/s/ Charles L. Stinneford
Charles L. Stinneford